

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO.: 1:21-CR-869
	:	
Plaintiff,	:	
	:	JUDGE SOLOMON OLIVER, JR.
vs.	:	
	:	
CHELSEA PERKINS,	:	<u>DEFENDANT CHELSEA</u>
	:	<u>PERKINS' RESPONSE TO</u>
Defendant.	:	<u>GOVERNMENT'S MOTION IN</u>
	:	<u>LIMINE TO PROHIBIT EXPERTS</u>
	:	<u>FROM TESTIFYING BEFORE</u>
	:	<u>LAYING FACTUAL PREDICATE</u>
	:	<u>(R. 158)</u>

The government moved to “preclude experts who spoke with Perkins to gather information on which they based their opinions from testifying to the jury unless and until Perkins first testifies on those facts to the jury.” (R. 158: MIL, PageID 1063). Although Ms. Perkins disagrees with any argument that Dr. Zito could not testify prior to Ms. Perkins, *see* FED. R. EVID. 703, the defense intends to present Ms. Perkins’ testimony prior to any expert testimony. The government’s motion, therefore, does not present any issue in dispute between the parties.

Respectfully submitted,

/s/ Stephen C. Newman

STEPHEN C. NEWMAN

Federal Public Defender

Ohio Bar: 0051928

/s/ CATHERINE ADINARO SHUSKY

CATHERINE ADINARO SHUSKY

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